

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

SONIA R. HAMMOCK, §  
Plaintiffs, §  
§  
v. § CIVIL ACTION NO.  
NELL E. LAMB and TODD SWING, § 07-CV-00896-WHA-TFM  
et al., §  
Defendants. §

**PLAINTIFF'S REQUEST FOR PRODUCTION TO DEFENDANT  
NELL ELAINE LAMB RELATING TO THE LIMITED ISSUE OF DOMICILE**

COMES NOW the Plaintiff, SONIA R. HAMMOCK, in the above-styled cause, by and through undersigned counsel, and requests that Defendant NELL E. LAMB respond to the following Requests for Production of Documents within the time prescribed by the Alabama Rules of Civil Procedure:

**DEFINITIONS**

1. "Defendant", "You" or "Your" As used in this request, the terms "you" and "your" or "defendant, refers to the named Defendant NELL E. LAMB, her attorney(s), insurer(s), or anyone acting on her behalf, her attorney(s) behalf, and/or her insurer(s) behalf.

2. "Document." If used below, "document" means any original written, typewritten, handwritten, printed or recorded material, as well as all tapes, discs, non-duplicate copies and transcripts thereof, now or at any time in your possession, custody or control; and, without limiting the generality of the foregoing definition, but for the purposes of illustration only, "document" includes notes, correspondence, memoranda, business records, diaries, calendars, address and telephone records, photographs, tape recordings, financial statements and records, promotional materials, examinations, and reports of examinations. IF SAID DOCUMENT IS TWO-SIDED, PRODUCE A COPY OF THE DOCUMENT, BOTH FRONT AND BACK.

If any document was, but is no longer, in your possession or subject to your control, state what disposition was made of it, by whom, and the date or dates or approximate date or dates on which such disposition was made, and why.

**REQUESTS**

1. Produce clear copies of all licenses held by you including, but not limited to, driver's license, professional licenses, hunting licenses, fishing licenses and firearm permits from November 23, 2005 through September 24, 2007.

2. Produce all tax returns including federal, state, 1099s and W2s, for 2005, 2006 and 2007.

3. Produce written evidence of your voter registration from November 23, 2005 through September 24, 2007.

4. Produce records of all vehicle registrations and certificates of title for any vehicles you or a member of your family owned between November 23, 2005 and September 24, 2007.

5. Produce records of any charitable contributions you made between November 23, 2005 and September 24, 2007, including, but not limited to, any offering or donations to any church, civic club or social organization.

6. Produce copies of all evidence of ownership of property you have owned between November 23, 2005 and September 24, 2007, including but not limited to deeds, mortgages and payment of property taxes.

7. Produce copies of all bills and correspondence you received, including, but not limited to, utility bills (including

water, garbage, sewer, electricity, gas, television, cable, internet access, etc.), telephone bills (including cell phone bills for you or members of your immediate family), credit card bills, bank account statements, insurance, magazines, personal correspondence and any other items of mail that you received in or pertaining to the months of May 2007 through October 2007.

8. Produce written evidence of any rent or any hotel bill that you paid or was paid in your name or behalf for the year 2006 through September 2007.

9. Produce copies of all documents showing health care received by you or any member of your immediate family between November 23, 2005 and September 24, 2007, to include any and all doctors, dentists and/or hospital bills, insurance records, and any other evidence (canceled checks, appointment books, calendars, etc.) of visits to doctors, dentists, hospitals, or other health care providers.

10. Produce Copies of all prescriptions for medication that you filled between November 23, 2005 and September 24, 2007. For each, please include the name and address of the Pharmacy filling the prescription.

11. Produce written evidence of any and all moving expenses incurred by you between June 1, 2007 and September 24, 2007.

/s/ Tedford Taylor

TEDFORD TAYLOR (TAY071)

Attorney for Plaintiff

OF COUNSEL

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing upon counsel of record, by e-mailing a copy of same via Federal Court E-filing this the 28th day of November, 2007.

Larry Bradford  
lbradford@bradfordsears.com

/s/ Tedford Taylor